

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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Hearing Date:
MARCH 17, 2010

*Special Counsel to the Official Committee of Unsecured
Creditors of Lehman Brothers Holdings Inc., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : **Chapter 11**
: **Case No. 08-13555 (JMP)**
LEHMAN BROTHERS HOLDINGS INC., et al., : **Jointly Administered**
:
:
Debtors. :
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**JOINDER OF QUINN EMANUEL URQUHART & SULLIVAN, LLP TO
RESERVATION OF RIGHTS OF MILBANK, TWEED, HADLEY & McCLOY LLP
WITH RESPECT TO CERTAIN FEE COMMITTEE REPORTS PERTAINING
TO FEE APPLICATIONS OF RETAINED PROFESSIONALS**

Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), hereby joins in the
Reservation Of Rights Of Milbank, Tweed, Hadley & McCloy LLP With Respect To Certain Fee
Committee Reports Pertaining To Fee Applications Of Retained Professionals (the "Milbank
Response").

BACKGROUND

1. On December 14, 2009, Quinn Emanuel filed the Third Interim Fee Application
Of Quinn Emanuel Urquhart & Sullivan For Fees And Expenses Incurred As Special Counsel To
The Official Committee Of Unsecured Creditors (the "Third Interim Application"), seeking (i)
interim allowance and payment of compensation of \$2,248,453.00 for actual, reasonable and
necessary professional services rendered, and (ii) interim allowance and payment of \$144,241.20
for actual, reasonable and necessary expenses incurred during the period from June 1, 2009
through September 30, 2009.

2. On February 9, 2010, Quinn Emanuel received a response to the Third Interim Application from the Fee Committee. This response challenged \$73,844.97 in fees and \$34,822.37 in expenses requested by Quinn Emanuel. On February 22, 2010, Quinn Emanuel sent a written response to the Fee Committee addressing each of its concerns and requesting payment of all its fees and expenses. On March 10, 2010, the Fee Committee filed the Fee Report seeking to disallow \$53,895.97 in fees and \$22,979.10 in expenses.

RESPONSE

3. Consistent with the Milbank Response, Quinn Emanuel will accept and reduce the Third Interim Application by the proposed reductions of \$53,895.97 in fees and \$22,979.10 in expenses requested in the Fee Committee Report Pertaining To The Third Interim Fee Applications Of All Retained Professionals (the "Fee Report"), subject to its reservation of the right to argue, at the time of the final fee hearing, that it is entitled to reimbursement with respect to Fee Preparation Fees for the Third Interim Compensation Period and all prior and subsequent interim and final compensation periods.

4. Thus, Quinn Emanuel (a) agrees with the arguments and assertions set forth in the Milbank Response; (b) hereby joins in the Milbank Response; and (c) reserves any and all rights to be heard before this Court with respect to the Milbank Response and the Fee Report.

[signature page follows]

Dated: March 16, 2010
New York, New York

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Robert K. Dakis

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